

April 13, 1998

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Chairman William E. Kennard  
Commissioner Susan Ness  
Commissioner Harold Furchtgott-Roth  
Commissioner Michael Powell  
Commissioner Gloria Tristani  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, DC 20554

RE: Comments in Support of APT's Petition Requesting Rulemaking Proceeding to  
Implement Section 706 of the 1996 Telecommunications Act; RM-98449a44

Dear Chairman Kennard and Commissioners:

We are a coalition of organizations representing thousands of potential consumers of advanced telecommunications products and services. We serve senior citizens, people with disabilities, minorities, women, children, low-income families and small business owners through assistance with education, economic development, health care and other important life needs. Many of the people we assist confront enormous challenges that affordable access to advanced technology could minimize, if not eliminate. Therefore, we urge the Federal Communications Commission to hasten deployment of this vitally empowering technology by granting the petition filed by the Alliance for Public Technology ("APT"). In our view, the immediate rulemaking proceeding that APT requests in its petition will facilitate the Commission's prompt implementation of Section 706 of the Telecommunications Act of 1996.

One primary purpose of the 1996 Act is to "encourage the rapid deployment of new telecommunications technologies" to our nation's consumers. Accordingly, Section 706 specifically obligates the FCC to promote "reasonable and timely" deployment to all Americans of advanced telecommunications capability. We are concerned that more than two years after enactment of Section 706, the Commission still has not fulfilled this important responsibility to consumers.

Section 706(b) requires the Commission to begin examining no later than August 8, 1998, the extent of deployment to all the country's consumers, and to conduct periodic evaluations to monitor the progress. If progress towards "reasonable and timely" deployment is not satisfactory, the FCC must take "immediate" steps "to accelerate deployment" by removing investment barriers and promoting competition in the telecommunication markets.

We do not believe, however, that Congress intended for the Commission to wait until this August date before taking any action under Section 706. Such a "wait and see" approach would be contrary to the prompt action that drafters of the 1996 Act desired so that everyone would receive the substantial benefits of telecommunications technology without delay. Lawmakers understand, as we do, that those without access to interactive high-speed, high quality advanced telecommunications technology that sends and receives voice, data, video and graphics are in

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danger of falling into a class of information "have nots." To be sure, those who are technologically disadvantaged will only suffer more acutely the social, economic, and political problems that our organizations and others, and the government are working to resolve.

In supporting APT's petition, we wanted the Commission to understand the urgent need to use its authority to unleash the power of advanced telecommunications technology. By stimulating investment in advanced capability, the FCC will serve the public interest in concrete ways that will make it possible for every consumer to have access to: improved health care; distance and life-long learning opportunities; job training and placement resources; entrepreneurial skills training and small business opportunities; and economic development assistance. For people with disabilities, and senior citizens, advanced telecommunications technologies can facilitate independent living. It can also connect remote populations to other communities and minimize the effects of geographic isolation.

Our constituents cannot afford to lose more valuable time as they wait for the Commission to gather evidence about the slow spread of advanced telecommunications capability to every part of the country. We know the rapid deployment that Congress wanted is not progressing in a "reasonable and timely" manner and that the FCC must do more to achieve that goal. As APT suggests in its petition, the Commission must also begin a rulemaking proceeding to examine ways of removing barriers to investment in the infrastructure necessary to make advanced telecommunications universally available. It should also consider methods of promoting such investments in communities where nurturing applications of advanced technologies is essential to achieving ubiquitous deployment of telecommunications infrastructure.

For the reasons stated, we strongly recommend that the FCC grant APT's petition. In this way the Commission can demonstrate its serious commitment to ensuring that all consumers have access to the life enhancing benefits of advanced technology before the dawn of the new millennium. Thank you for your thoughtful consideration and swift action.

Sincerely,

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